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February 7, 2020

BY ECF

The Honorable Alison J. Nathan  
United States District Judge  
Thurgood Marshall United States Courthouse  
40 Foley Square, Room 2102  
New York, NY 10007

RE: Innocence Project v. National Museum of Health and Medicine, No. 19-cv-1574  
Letter motion to file documents under seal

Dear Judge Nathan,

Plaintiff submits this letter motion to file under seal its Response in Further Support of an Order Permitting Disclosure of a Particular Document, and related documents. The documents to be filed under seal all relate to the ongoing litigation regarding Plaintiff's request to lift a non-disclosure obligation with respect to a particular document that is currently subject to the Protective Order in this case. See ECF Nos. 39, 42, 45, 51.

In particular, we seek leave to file under seal the following three documents:

- (1) The brief that we are filing in response to the objections that have been submitted to the Court by one of the individuals at issue in the document. The brief identifies that individual and provide details about why Plaintiff believes the document should be disclosed. All of those matters remain subject to the Protective Order pending this Court's determination.
- (2) One exhibit to Plaintiff's brief. That exhibit is a recently-issued court opinion that discusses the individual in question by name and in some detail. Plaintiff is concerned that if it were filed on the public docket, it would clearly and prematurely disclose the identity of the individual whose name is currently protected.
- (3) The Certificate of Service showing that service was accomplished upon the two non-party individuals that the Court has invited to participate in this briefing. Both of their names remain subject to the protective order.

Once the Court has resolved whether and to what extent the information in question is subject to a continuing non-disclosure obligation, Plaintiff will file copies of the sealed documents on the public docket via ECF unredacted, as appropriate, in a manner consistent with the Court's ruling and its individual rules of practice.

Defendant's counsel consents to this motion to seal. We thank the Court for its time and consideration.

Respectfully submitted,

/s/Jonathan Manes

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